

Suzy,

EPA was notified that there were some sampling concerns and discussion associated with the locations of samples SS-162, SS-163 and SS-164. EPA's oversight personnel has reported the following:

"On January 6 and 7 ARCADIS performed recon for soil sampling locations SS-162, SS-163 and SS-164.

However, due to each location being inundated with water (ranging from 1.5' to 3' of water) and the type of vegetation growing within the vicinity, ARCADIS field staff determined that it would be more accurate to characterize all 3 sampling points consisting of sediment rather than soil.

Due to this determination, samples were not collected from any of the three locations. ARCADIS is evaluating their options and if they are going to propose alternate locations via a field change request and thus will need to get approval to either move the locations to a more upland area consisting of soil or collect these three points as sediment.

It is important to note that only location SS-164 had an upland area consisting of soil within close proximity of approximately 40 feet. Locations SS-164 and SS-165 were several hundred feet away from any upland areas showing soil characteristics."

As previously discussed, changes to the approved SAP must be approved by EPA prior to implementing a change. Please provide a detailed response regarding the collection of samples SS-162, SS-163 and SS-164.

Regards,

Tanya

QAPP Worksheet #6: Communication Pathways

Communication Driver	Organization	Name	Contact Information	Procedure (timing, pathway, documentation, etc.)
QAPP changes prior to field work and during project executions	ARCADIS	Dennis Capria, QA Manager	315.671.9299	Any major changes to the QAPP must be approved by Dennis Capria and the Project Coordinator and USEPA before the changes can be implemented.

QAPP SOP: Investigation-Derived Waste Handling and Storage page 3 last sentence: If changes to the sampling procedures are required due to unanticipated field conditions, the changes will be discussed with the Project Manager and Client as soon as practicable and documented in the report.